

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO. 4:15-868
	)	
	)	
v.	)	
	)	
BRIAN KEITH PERDUE	)	

**MOTION FOR DOWNWARD DEPARTURE**

NOW COMES the United States, by and through its undersigned attorney, and would respectfully make motion to the above-referenced court pursuant to § 5K1.1 of the United States Sentencing Guidelines and Title 18, United States Code, § 3553(e), that this Honorable Court depart downward from the applicable guidelines regarding the defendant, Brian Keith Perdue, and, in support of such motion, does state as follows:

1. The defendant was charged with Conspiracy to Commit Application Fraud in a two person indictment. The grand jury returned a true bill on December 8, 2015. The defendant pleaded guilty on July 26, 2016 under the terms of a plea agreement. He admitted to involvement in a conspiracy to sell real estate at inflated prices.

2. The Defendant provided truthful information concerning mortgage fraud. His cooperation began before his charge when he was not represented by counsel and continued after he was indicted. This information included his own illegal actions and the Defendant ultimately agreed to enter a plea, as noted above.

3. The Defendant also provided information concerning the illegal activities of his codefendant. His codefendant ultimately also entered a plea of guilty.

4. The information and assistance from the defendant have proven substantial, and the undersigned deems him an appropriate candidate for a downward departure.

5. The undersigned has consulted with Agent Torrance Bassard, the case agent in this matter, concerning this motion. Agent Bassard concurs with the information that is contained herein.

WHEREFORE, the Government moves that this Honorable Court grant the Motion for Downward Departure as herein requested in the case of Brian Keith Perdue.

Respectfully submitted,

BETH DRAKE  
ACTING UNITED STATES ATTORNEY

BY: s/ John C. Potterfield  
JOHN C. POTTERFIELD, ID NO. 6472  
Assistant United States Attorney  
1441 Main Street, Suite 500  
Columbia, South Carolina 29201  
(803) 929-3000  
[john.potterfield@usdoj.gov](mailto:john.potterfield@usdoj.gov)

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